

14th June 2024

CONTENT OF LETTER SENT TO FUND INVESTORS

We are making the following changes:

- Investment approach – SPW Multi-Manager fund assets will be managed by a single investment management firm (or sub-adviser firm).
- The names of the SPW Multi-Manager funds (and the ICVC) will change to reflect this.
- We are adopting a new Responsible Investment Policy.
- Our fee structure is being simplified.

The funds impacted are:

The SPW Multi-Manager Funds

SPW Multi-Manager Asia ex Japan & Global Emerging Markets Equity Fund
SPW Multi-Manager North American Equity Fund
SPW Multi-Manager European ex UK Equity Fund
SPW Multi-Manager Japanese Equity Fund
SPW Multi-Manager UK Equity Fund
SPW Multi-Manager UK Equity Income Fund
SPW Multi-Manager Global Investment Grade Bond Fund
SPW Multi-Manager Global High Income & Emerging Markets Bond Fund
SPW Multi-Manager Global Sovereign Bond
SPW Multi-Manager Global Real Estate Securities Fund; and

SPW Global Corporate Low Duration Bond Fund.

Changes to the Investment Approach

What are we doing?

We are changing the way the SPW Multi-Manager funds are managed. Currently, the Investment Adviser, Schroder Investment Management Limited ('Schroders') delegates the management of some of the assets of the SPW Multi-Manager funds to third party investment management firms, referred to as sub-advisers. Going forward, the intention is to move away from the use of sub-advisers and for the assets to be managed by Schroders only. The exception to this is in relation to the SPW Multi-Manager Global Real Estate Securities Fund, where a single, specialist sub-adviser firm will be retained by Schroders to manage the fund's assets.

The delegation to sub-advisers remains an option that can be deployed by Schroders in any fund, where it believes that assets will be best managed using this approach.

Why are we doing it?

Our decision follows a review of the current benefits of a multi-manager model vs. a single investment management firm model solution. We believe that a single investment firm approach is the most appropriate for delivering the best, long term investment outcomes for our investors.

Schroders is one of the largest investment managers in the world with proven investment capabilities and strong performance records across asset classes and geographies.

Having all assets under the investment management of Schroders will enable better understanding and management of the investment strategies and styles that may be deployed and potentially blended together in our funds to enhance investor outcomes. Furthermore, being closer to the portfolios, should enable the more efficient implementation of changes to investment strategy, particularly in difficult market conditions.

Finally, the fund portfolios will largely reflect the economic, market and asset views of a single, world leading, investment house, Schroders (and that of a specialist sub-adviser, Russell Investments Limited, in the case of the SPW Multi-Manager Global Real Estate Securities Fund.)

Our relationship with Schroders gives us access to what we believe are world-class investment opportunities.

When will it happen?

The process of changing from the current sub-advisers is expected to begin from 19th August 2024 with portfolio transition taking place over the following months. We expect the portfolio transitions to be fully completed by the end of November 2024.

Will the Fund Investment Objectives and Policy change?

No changes will be made in relation to the transition to a single manager model. The Investment Policy of the Funds will, however, change in response to the adoption of a new Responsible Investment Policy (discussed below).

Will the fund names change?

Yes. The change of the name of the SPW Multi-Manager ICVC (to the SPW Managed ICVC) and of the SPW Multi-Manager funds, to remove the term 'Multi-Manager', will take place on 19th August 2024.

Will costs be incurred in the transition of the fund portfolios?

Although taking place in an orderly manner over a period, the transition of the portfolios will necessarily incur transaction related costs – including market spreads, broker commissions and transaction related taxes. These costs will be borne by the relevant fund.

Portfolio trading activity is not expected in relation to the SPW Multi-Manager Global Real Estate Securities Fund in respect of the transition to a single sub-adviser.

As at 10th June 2024, the portfolio transition costs (as a percentage of the fund value) were estimated to be:

Fund	Cost
SPW Multi-Manager Asia ex Japan & Global Emerging Markets Equity Fund	0.47%
SPW Multi-Manager North American Equity Fund	0.31%
SPW Multi-Manager European ex UK Equity Fund	0.31%
SPW Multi-Manager Japanese Equity Fund	0.18%
SPW Multi-Manager UK Equity Fund	0.50%
SPW Multi-Manager UK Equity Income Fund	0.54%
SPW Multi-Manager Global Investment Grade Bond Fund	0.13%
SPW Multi-Manager Global High Income & Emerging Markets Bond Fund	0.41%
SPW Multi-Manager Global Sovereign Bond	0.20%

Adoption of a new Responsible Investment Policy

What are we doing and why?

The transition to a single investment management firm model provided an opportunity to review our approach to responsible investing. Following this, we are (on 1st October 2024) adopting a new SPW Responsible Investment Policy. This will be available at spw.com.

The new policy will apply to the SPW Multi-Manager funds and the SPW Global Corporate Low Duration Bond Fund.

The Policy sets out:

Exclusions and restrictions

The Investment Advisor is expected to broadly consider ESG characteristics in the investment selection process and there are a number of specific asset exclusions in which the Fund will not make investment. Current exclusions include companies with revenue exposure to controversial weapons (cluster munitions, antipersonnel mines, chemical, and biological weapons) and thermal coal securities (companies that derive more than 20% of their revenues from thermal coal mining).

Funds - ESG assessment

The ACD will undertake a firm-level assessment of the CIS parent company using a proprietary scoring process developed by the Investment Advisor to grade the investment manager's ESG profile. The assessment has a broad array of questions split across various categories. Each category has a weighting that contributes towards the firm's overall ESG score. The assessment uses a five-point scale (1 to 5, with 5 being the best) with an overall score calculated based on the weighted sum of all categories. The Fund will not invest in any CIS that falls below average (i.e. where it is scored 1 or 2).

Assessments will be subject to annual reviews and if a CIS is found to have a below average firm level score, then the Investment Advisor will have three months to divest the Fund, subject to operational constraints.

Engagement and stewardship

The ACD's policies and expectation on engagement and stewardship. The Investment Adviser is expected to engage with the companies in which they invest, particularly where ESG factors relating to that company can be improved. The Investment Adviser will periodically produce an engagement report which will detail the engagement activity which has occurred within the Fund.

Monitoring and oversight

The ACD's approach to the monitoring and oversight on ESG factors. The ACD expects the Investment Advisor to follow the UK Stewardship Codes to engage with the companies and/or CIS (as appropriate) in which the Fund invests to improve ESG performance. The ACD will monitor the Fund to ensure that the Responsible Investment Policy is implemented appropriately.

The policy will be updated from time to time and will be reviewed at least annually.

The transition from the existing approach to adoption of the new SPW Responsible Investment Policy is expected to have minimal impact on the fund portfolios.

Changes to the fee structure

What are we doing?

We are changing the way that we calculate and charge the fees for the management and operation of your fund.

Why are we doing it?

We are evolving our approach to fees and charges – to provide greater simplicity and clarity. We understand that it may be unnecessarily difficult for investors to understand how, and by whom, the costs of the management and operation of the funds are paid and we want to make this clearer.

We are adopting a simplified approach through which investors can readily understand our charges and what we are paying from these, who is paying the fees of the Investment Adviser (and of any sub-advisers), and from where fund related costs are paid.

Therefore, we are moving from the "All-in charge" to a breakdown of the annual management charge ('AMC') and OCF.

How does this change effect the charges of the funds?

Details of current and expected ongoing charges ('OCF') for each relevant fund are provided in Appendix 1. No new charges of fees are being introduced.

When will it happen?

With effect from 19th August 2024.

What should I do if I want further details?

If you have any questions about these changes, please contact your financial adviser or call our Customer Services Centre on **+44 (0) 344 822 8910**. Please be aware that the Customer Services Centre cannot give investment advice

Appendix 1

Summary of Changes to Fee Structure (from 19th August 2024)

The following terms will help you understand the table below:

- "ACD", the authorised corporate director of the SPW Multi-Manager ICVC, being Scottish Widows Schroder Personal Wealth (ACD) Limited;
- "Annual Management Charge", a charge taken from Scheme Property and payable to the ACD for the management and operation of a Fund;
- "bps", basis points, a unit of measure used in finance to describe the percentage change in the value or rate of a financial instrument (for example, one basis point is equivalent to 0.01% (1/100th of a percent) or 0.0001 in decimal form);
- "Fund", a sub-fund of the SPW Multi-Manager ICVC as set out in the table below;
- "OCF", the Ongoing Charges Figure, an all-inclusive figure for the running costs of the relevant Fund based on a standardised methodology. It gives an indication of the overall cost of investing in a Fund. The OCF is made up of the Annual Management Charge and a variety of other operating costs such as registration charges, fees payable to the depositary and the custodian; and
- "Scheme Property", the property of a Fund.

Fund	Share Class	Current All-In Charge or Annual Management Charge (%)	Current OCF (%)	New Annual Management Charge (%)	Expected Fund Charges (%)	New OCF (%)	Current vs. new OCF (bps)
SPW Multi-Manager Asia ex Japan & Global Emerging Markets Equity	Q Inc/Acc.	0.85	0.85	0.77	0.08	0.85	-
SPW Multi-Manager Asia ex Japan & Global Emerging Markets Equity	X Acc.	0.55	0.55	0.075	0.08	0.155	-0.395
SPW Multi-Manager North American Equity	Q Inc/Acc.	0.85	0.74	0.73	0.01	0.74	-
SPW Multi-Manager North American Equity	X Acc.	0.55	0.44	0.075	0.01	0.085	-0.355
SPW Multi-Manager European ex UK Equity	Q Inc/Acc.	0.85	0.81	0.77	0.03	0.80	-0.01
SPW Multi-Manager European ex UK Equity	X Acc.	0.55	0.51	0.075	0.03	0.105	-0.405
SPW Multi-Manager Japanese Equity	Q Inc/Acc.	0.85	0.85	0.81	0.04	0.85	-
SPW Multi-Manager Japanese Equity	X Acc.	0.55	0.55	0.075	0.04	0.115	-0.435
SPW Multi-Manager Global Investment Grade Bond	Q Income.	0.65	0.59	0.57	0.02	0.59	-
SPW Multi-Manager Global Investment Grade Bond	X Acc.	0.35	0.29	0.075	0.02	0.095	-0.195
SPW Multi-Manager Global High Income & Emerging Markets Bond	Q Income.	0.70	0.70	0.68	0.02	0.70	-
SPW Multi-Manager Global High Income & Emerging Markets Bond	X Acc.	0.40	0.40	0.075	0.02	0.095	-0.305
SPW Multi-Manager Global Sovereign Bond	Q Income.	0.60	0.59	0.55	0.04	0.59	-
SPW Multi-Manager Global Sovereign Bond	X Acc.	0.30	0.29	0.075	0.04	0.115	-0.175
SPW Global Corporate Low Duration Bond Fund	Q Income	0.44	0.47	0.44	0.03	0.47	-
SPW Global Corporate Low Duration Fund	X Acc.	0.15	0.19	0.075	0.03	0.105	-0.085
SPW Multi-Manager Global Real Estate Securities Fund	B Inc/Acc.	0.37	1.09	1.05	0.04	1.09	-

SPW Multi-Manager Global Real Estate Securities Fund	P Income	0.20	0.92	0.88	0.04	0.92	-
SPW Multi-Manager Global Real Estate Securities Fund	Q Income	0.20	0.82	0.78	0.04	0.82	-
SPW Multi-Manager Global Real Estate Securities Fund	X Acc	0.00	0.72	0.075	0.04	0.115	-60.5
SPW Multi-Manager Global Real Estate Securities Fund	X Inc	0.00	0.72	0.075	0.04	0.115	-60.5
SPW Multi-Manager UK Equity Fund	B Acc.	0.32	0.84	0.83	0.01	0.84	-
SPW Multi-Manager UK Equity Fund	P Income	0.20	0.70	0.71	0.01	0.72	-
SPW Multi-Manager UK Equity Fund	Q Income	0.20	0.61	0.61	0.01	0.62	-
SPW Multi-Manager UK Equity Fund	X Acc.	0.00	0.51	0.075	0.01	0.085	-0.435
SPW Multi-Manager UK Equity Income Fund	B Acc.	0.42	0.92	0.90	0.02	0.92	-
SPW Multi-Manager UK Equity Income Fund	B Income	0.42	0.92	0.90	0.02	0.92	-
SPW Multi-Manager UK Equity Income Fund	P Income	0.20	0.70	0.68	0.02	0.70	-
SPW Multi-Manager UK Equity Income Fund	Q Income	0.20	0.60	0.58	0.02	0.60	-
SPW Multi-Manager UK Equity Income Fund	X Acc.	0.00	0.50	0.075	0.02	0.095	-0.405